

Committee (hereafter, the “Intervenor”) be extended by one week, from October 24, 2019 to October 31, 2019. The Hospital requests this extension of time because on Friday, October 18, 2019, the Undersigned Counsel was provided notice by a separate client of a petition for a representation election at its facility that was filed with the National Labor Relations Board, and a related representation case hearing before the National Labor Relations Board scheduled for Monday, October 28, 2019. This development requires the Undersigned Counsel to undertake unplanned travel during the course of the week of October 21, 2019, and will severely limit the Undersigned Counsel’s time to adequately prepare its Response and Opposition to the Motion for Sanctions filed by the National Nurses Organizing Committee. The Undersigned Counsel has informed Counsel for the Intervenor and Counsel for the National Labor Relations Board of the Hospital’s Motion, and neither party opposes the Hospital’s Motion.

WHEREFORE, the Hospital respectfully requests that this Court grant the Hospital’s Unopposed Motion and extend the time for filing of the Hospital’s Response and Opposition to the Intervenor’s Motion for Sanctions to October 31, 2019.

Dated: Atlanta, Georgia
 October 21, 2019

Respectfully Submitted,

_____/s/_____

KAITLIN KASETA LAMMERS, ESQ.

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2. The Motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. 32(a)(6) because the Motion has been prepared in a proportionally-spaced typeface using Microsoft Word in 14-point Times New Roman font.

Dated: Atlanta, Georgia
 October 21, 2019

Respectfully Submitted,

____/s/_____

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Dated: Atlanta, Georgia
October 21, 2019

Respectfully Submitted,

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